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and

Its Attorneys

POSTED

1 **Q. Please state your name and business address.**

2 A. My name is Anne Cullather. My business address is 4250 North Fairfax Drive, Arlington,
3 Virginia 22203.

4
5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Qwest Communications Corporation ("Qwest"), the Applicant in this
7 Cause. Currently, I serve as Senior Director, Local Services Planning and Development.

8
9 **Q. Please describe your background and work experience.**

10 A. I joined LCI Communications in November, 1997 as Director of Carrier Relations. After
11 LCI was acquired by Qwest Communications in June of 1998, I continued as Director of
12 Carrier Relations for the combined company. I was promoted to the position of Senior
13 Director, Local Services Planning and Development, with responsibility for local
14 interconnection arrangements, access and interconnection with competitive local exchange
15 carriers, and public policy issues affecting those arrangements.

16 Prior to my employment with LCI and Qwest, I was employed for a year by a
17 small CLEC, US ONE Communications, as Director of Carrier Relations. Prior to that
18 position, I had been employed by MCI Communications for 13 years in a variety of
19 positions that included public policy and carrier relations responsibilities for the long
20 distance business unit, as well as with MCImetro to launch MCI's entry into the local
21 telecommunications services arena.

1 **Q. What is the purpose of your testimony?**

2 The purpose of my testimony is to support the Application of Qwest for authority to
3 provide local telecommunications services throughout the State of Tennessee.

4
5 **Q. Is Qwest authorized to do business in Tennessee?**

6 A. Yes. A copy of the document evidencing this qualification was appended as Exhibit B to
7 Qwest's Application.

8
9 **Q. Please provide a brief description of Qwest.**

10 A. Qwest provides multimedia communications services to interexchange carriers and other
11 communications entities, businesses, and consumers, using its own facilities as well as
12 facilities leased from other carriers. Qwest also constructs and installs fiber optic
13 communications systems for other communications companies. Qwest has completed
14 construction of the Qwest Macro Capacity Fiber Network, a fiber optic network that
15 employs a SONET ring architecture to cover in excess of 25,000 miles in North America
16 and connects more than 125 cities.

17
18 **Q. Please describe the geographic areas of Tennessee that Qwest proposes to serve.**

19 A. Qwest seeks authority to provide competitive local exchange services in all of the
20 exchanges of BellSouth Communications, Inc. ("BellSouth") and other certificated local
21 exchange companies except in any area served by a telephone cooperative or any ILEC
22 with fewer than 100,000 total access lines.

1 **Q. Does Qwest hold Certificates of Authority in other jurisdictions?**

2 A. Yes. Qwest has interexchange authority in the District of Columbia and every state except
3 Alaska and Hawaii. Qwest is in the process of seeking authority to provide local exchange
4 service in 42 states, plus the District of Columbia. Such authority has currently been
5 granted in the following jurisdictions: Alabama, California, Colorado, Delaware, Florida,
6 Hawaii, Illinois, Indiana, Kansas, Kentucky, Maryland, Massachusetts, Michigan,
7 Minnesota, Missouri, Montana, New Hampshire, New York, North Carolina, Oklahoma,
8 Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Virginia, Washington, West
9 Virginia, and the District of Columbia. Authority to provide such service has not been
10 denied by any jurisdiction, nor has Qwest had its authorization to provide
11 telecommunications services revoked in any jurisdiction.

12
13 **Q. Does Qwest intend to collect advance payments or deposits from its customers?**

14 A. No. Qwest has no plans to require advance payments or deposits from its customers.
15

16 **Q. Does Qwest intend to provide 900 or 700 number services?**

17 A. Qwest has no intention of providing 900 or 700 services at this time.
18

19 **Q. Is Qwest financially qualified to provide the services it proposes within Tennessee?**

20 A. Yes. As indicated in the financial documents which Qwest supplied with its Application,
21 Qwest has ample capital to compete effectively in the market for competitive local
22 exchange services in Tennessee. In addition, Qwest's parent, Qwest Communications

1 International, Inc., is publicly traded on the NYSE under the symbol "Q" and presently has
2 a market capitalization in excess of \$80 billion.

3
4 **Q. Does Qwest have the technical and managerial experience which qualifies it to**
5 **provide the services it proposes within Tennessee?**

6 A. Yes. As set forth above, Qwest has extensive experience in providing telecommunications
7 services in most jurisdictions in the United States. Qwest also has experience in
8 constructing, installing and implementing fiber optic communications systems for itself and
9 other telecommunications companies. Qwest described the extensive managerial
10 experience of the persons who will manage Qwest in Exhibit C which was appended to its
11 Application.

12
13 **Q. How will Qwest provide repair and maintenance services for its customers?**

14 A. Qwest currently provides world-class customer service support to its customers, including
15 repair and maintenance functions. Those services would be extended to Qwest's local
16 exchange customers. Qwest would also ensure that its interconnection agreements with
17 incumbent local exchange carriers include the essential provisions for repair and
18 maintenance in the event customers encounter problems related to unbundled network
19 elements which Qwest obtains from those ILECs.

1 **Q. Describe the status of Qwest's interconnection negotiations.**

2 A. On August 4, 2000, Qwest executed a resale agreement with BellSouth which covered the
3 9 state region, including Tennessee. For facilities-based interconnection, Qwest has begun
4 to review existing interconnection agreements approved by the Tennessee Regulatory
5 Authority ("Authority") for the purpose of determining whether to adopt an existing
6 agreement pursuant to Section 252(i) of the Communications Act of 1934, as amended, or
7 negotiate new agreements with BellSouth. Qwest will file a separate application to obtain
8 Commission approval of any interconnection agreement it enters into with BellSouth,
9 prior to providing any local services in Tennessee.

10

11 **Q. Will Qwest's rates for intrastate telecommunications services in Tennessee be**
12 **competitive with other carriers providing similar services?**

13 A. Yes. Qwest's service offering will be subject to direct competition from BellSouth, the
14 major incumbent local exchange carrier in Tennessee, as well as competitive carriers that
15 have already entered the market. Qwest's rates in Tennessee will be comparable to those
16 offered by other carriers for similar local exchange services.

17

18 **Q. How will Qwest handle billing matters?**

19 A. Qwest will bill its customers monthly at the rates specified in its tariff. Invoices sent to
20 customers will include a toll-free number for customer inquiries or complaints. Qwest will
21 bill its customers directly and will not use billing agents.

1 **Q. How will Qwest handle customer service matters?**

2 A. Qwest offers its customers comprehensive customer support. Qwest has in place
3 customer service systems that facilitate the prompt and complete resolution of service,
4 billing, and repair issues. Qwest monitors its networks from a central Network Operations
5 Center, and has customer service representatives available to customers 24 hours a day,
6 seven days a week.

7

8 **Q. Will Qwest be providing COCOT service?**

9 A. No.

10

11 **Q. Briefly describe how approval of Qwest's Application is in the public interest.**

12 A. Approval of Qwest's application is in the public interest because it will increase
13 competition in the market for telecommunications services in the State of Tennessee,
14 which should lead to downward pressure on prices, more innovative service offerings, and
15 better overall service quality for Tennessee customers.

16

17 **Q. Is Qwest familiar with the Authority's applicable rules and regulations and does it
18 commit to comply with them?**

19 A. Yes.

20 **Q. Does this conclude your testimony?**

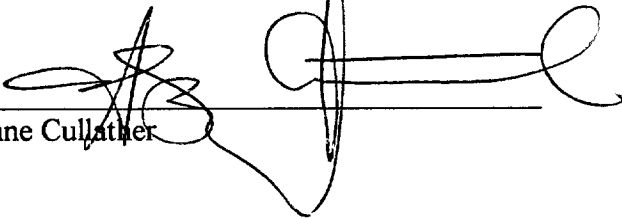
21 A. Yes, it does.

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
COUNTY OF ARLINGTON)


BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the state and county aforesaid, personally came and appeared Anne Cullather, Senior Director, Local Services Planning and Development for Qwest Communications Corporation, who, being by me first duly sworn, deposed and said that:

She is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 99-00922 on behalf of Qwest Communications Corporation, and if present before the Authority and duly sworn, her testimony would be as set forth in the annexed testimony consisting of seven (7) pages.



Anne Cullather

Sworn to before me and subscribed in my
presence this the 24th day of October, 2000.



Notary Public

My commission expires: My Commission Expires May 31, 2003